Tips for Submitting Timely, Accurate, and Complete NPDES Discharge Monitoring Reports

- This U.S. EPA Compliance Advisory is directed to owners, operators, and permit holders of Clean Water Act (CWA) National Pollutant Discharge Elimination System (NPDES) regulated facilities with a Discharge Monitoring Report (DMR) submission requirement.
- The EPA and state National Compliance Initiative (NCI) to reduce the rate of significant noncompliance (SNC) with NPDES permits has as a focus reducing SNC caused by failure to submit a required DMR or submission of a faulty DMR.
- Failure to report timely, accurate, and complete DMRs is the single largest source of SNC nationwide. The SNC status for each NPDES permit is calculated by EPA (ICIS-NPDES) and this information is made publicly available at https://echo.epa.gov.
- Submission to the state or EPA of timely, accurate, and complete DMRs is a requirement of most NPDES permits and is key to both the CWA's compliance and enforcement scheme and to improving and protecting surface water and drinking water quality.
- This advisory is designed to help NPDES permittees comply with DMR reporting requirements and avoid noncompliance.

About the National Compliance Initiative

The Reducing SNC with NPDES Permits NCI focuses EPA's full range of enforcement and compliance

DMR Submission Requirements and Verifying Accuracy of Your Submitted Compliance Data

In 2019, EPA initiated the SNC NCI to improve NPDES permittee compliance. The first goal of the NCI is to cut the rate of SNC in half. Compliance with NPDES permits is critical to improving and protecting our nation's waters. Permittee self-monitoring and self-reporting through the timely, accurate, and complete submission of DMRs is essential to ensuring compliance. Nationally, DMR reporting violations account for over half of the facilities in SNC status.

Failure to submit a DMR, late submission of a DMR, and incomplete DMRs are all violations of NPDES permit requirements that are potentially subject to enforcement and penalties. Permittees must timely submit accurate and complete DMRs as frequently as their permit requires to avoid reporting violations. Permittees are also encouraged to monitor their compliance status in EPA's Enforcement and Compliance History Online (ECHO) tool at https://echo.epa.gov. Verify in ECHO that your DMR submissions and subsequent compliance status are correct and notify your permitting authority of inaccurate compliance status or violations you find. Taking these steps will ensure that your facility's compliance status is displayed accurately to the permitting authority and the public and will aid the permitting authority in correcting any errors. In some rare cases, SNC may be incorrectly designated in ECHO due to entry errors or data transfer problems which adds to the value of permittee review of their DMR data and compliance status data.

DMR Submission Basics

All DMR submission requirements are described in the NPDES permit. These include the pollutant parameters to be reported, sampling frequency and type, and DMR submission frequency and due date. Your DMR submission must exactly adhere to the specified monitoring and reporting requirements in the permit. If you

cannot locate this information in your permit or are otherwise uncertain, contact your permitting authority for clarification.

TIP:

When in doubt about parameters, sampling frequencies, sample types, DMR submission frequency, DMR due dates, or other monitoring and reporting questions, check your permit and/or contact your permitting authority.

DMR FAQs

Where do I submit my DMR?
EPA's 2015 NPDES Electronic Reporting Rule requires that permittees submit DMRs electronically, unless the permittee has obtained a waiver allowing manual DMR submission. EPA and many state permitting authorities have permittees use EPA's electronic NetDMR system for reporting DMRs. Some states utilize their own electronic DMR (eDMR) reporting system. Permittees can identify which reporting system to use for submitting DMRs by checking their permit or by checking here: Reporting NetDMRs

If your permitting authority uses EPA's NetDMR system, you must request access to your DMR in NetDMR. The first step in this process is to create a CDX account. You can register for a CDX account at: https://cdx.epa.gov. Directions for creating a NetDMR account in CDX can be accessed here: Creating NetDMR Account . After creating a CDX account you will be able to access the NetDMR program service. You can access NetDMR at: https://npdes-ereporting.epa.gov/net-netdmr. Lastly, inside the NetDMR program service you must request access to your specific permit or permits.

For accessing state eDMR systems (for states that don't use NetDMR), visit your permitting authority's website, or contact your permitting authority to learn how to create an account and access your eDMRs.

What should I do if I am having issues accessing my account to submit my DMR?
If you are having issues accessing your NetDMR/CDX account because you have forgotten your User ID or password, your password has expired, you failed too many log-in attempts, or have forgotten your security questions answers, navigate to the CDX log in page at https://cdx.epa.gov/CDX/Login and follow the steps to retrieve your User ID or change your password. If your log-in issues continue, try changing to a different browser or clearing the cache on your computer. If you are still having issues or need additional help, contact the EPA NPDES Helpdesk at 888-890-1995, or if your state does not use NetDMR, contact your state's eDMR helpdesk or contact.

How do I submit my Sampling results and other DMR information?
Sampling results and other DMR information can be directly entered into NetDMR or the data can be imported to NetDMR from a spreadsheet. Similarly, for non-NetDMR states, direct entry of DMR information would be done in the state's eDMR system which also may allow the data to be imported from a spreadsheet. If you import your data to NetDMR, you must do this using a comma delimited or comma separated value format with a .TXT, .CSV or .zip file extension. Microsoft Excel templates and instructions for importing DMR data to NetDMR can be found here: https://usepa.servicenowservices.com/oeca_icis?sys_kb_id=638c368a1be341d0fd044262f54bcb9a&id=kb_article_view&sysparm_rank=6&sysparm_tsqueryId=3cea94121bc4d11cfd044262f54bcb9a . Contact your permitting authority or visit their website for DMR submission requirements that may be specific to your permit.

Do I need to submit a DMR even if there was no discharge during the monitoring period?
Yes, most eDMR systems like NetDMR require a submission of a scheduled DMR even if there is no discharge during the monitoring period. In NetDMR, you must apply a no data indicator (NODI) code "C - No Discharge" to *all parameters and values on the DMR form*. The NODI code can be applied to the entire DMR from in NetDMR by checking the Update NODI box on the DMR search results screen and then clicking the Update

NODI button or by selecting appropriate NODI code from the Form NODI dropdown box within the DMR from. The last step after applying the appropriate NODI code is to sign and submit the DMR. Check with your permitting authority if you are unsure of how to properly report no discharges or sign and submit your DMRs.

How do I report a parameter value that was below the detection limit or no detection?
NetDMR allows you to use a the less-than (<) symbol if your regulatory authority or permit requires a value to be reported. You may also use NODI code "B – Below Detection Level/No Detection" to report a parameter or value below the detection level or had no detection. Do not select NODI Code "C - No Discharge" for reporting below detection limit or no detection. Check with your permitting authority and permit for the proper procedure for inputting a value below the detection level.

Checking NPDES Permit Compliance Status in ECHO

The Enforcement and Compliance History Online (ECHO) (https://echo.epa.gov) website allows permittees to check their compliance status, including violations for failure to submit DMRs. This is done using the Detailed Facility Report option in ECHO.

To view a Detailed Facility Report for a specific facility, enter the NPDES permit ID # in the "Quick Search" box. In the Detailed Facility Report, scroll down to the "Enforcement and Compliance" section and "Three-Year Compliance History by Quarter" subsection. In this subsection, the row titled, "Facility-Level Status" will show the SNC and noncompliance history, and the "Quarterly Noncompliance Report History" row will show the primary cause of any SNC reported in the row above. One cause of SNC that can appear in this row is "Failure to Report DMR - Not Received." The "Quarter 12" column in this table shows the facility's most recent compliance status.

Who do I contact for support?
NetDMR users may submit a request to the Helpdesk, email NPDESeReporting@epa.gov or contact the Helpdesk at 877-227-8965. Additionally, NetDMR users may contact their state or regional NetDMR lead listed here: NetDMR Contacts . Other eDMR system users should have a similar Helpdesk option for system issues. When in doubt, contact your permitting authority.

For questions regarding your permit or DMRs (not concerning electronic DMR submission), contact your permitting authority. Additional EPA and state contacts are located here: https://www.epa.gov/npdes/contact-us-general-information-about-npdes.

How do I check to ensure my DMRs are properly submitted, and my compliance status is accurate?
Always check your DMRs before submitting them to ensure that they are accurate and complete and that they capture the reporting required in your permit. Use EPA's ECHO tool to access your detailed facility report (see the box above) to review your permit's compliance status. Finally, if your facility is in violation of any permit requirements you should take prompt corrective action to ensure a return to compliance.

Common NetDMR DMR Errors

Error messages when adding attachments and signing your DMR

- Make sure there are no spaces or special characters in your attachment's file name before attaching. Error messages when signing may be due to incorrectly submitting your password or security question. NetDMR will email you if the submission fails and you must sign and submit again.

Units or sampling methods that do not match those required by the permit or sample values outside of the permit limit

- Reporting the wrong units or sampling method in your DMR could generate an erroneous violation. If you do not use the units or sampling method required by your permit (or have entered a value that exceeds an effluent limit), NetDMR will issue a soft error providing an opportunity to make a correction.

You must confirm that these inputs are correct before submitting your DMR. You will avoid generating erroneous violations if you input your results in the proper units – and with the proper number of significant figures. Refer to your permit or contact your permitting authority if you have questions regarding the permit limits, sampling methods, units of measurement, number of significant figures, etc.

Missing values

- You must input a numeric value or a NODI code selection for each pollutant parameter reported in your DMR. To avoid submitting an incomplete DMR (a reporting violation), you cannot leave any parameter that is required to be reported blank. If you do not have a value to input for a parameter, select the appropriate NODI code to explain why you don't have it. In NetDMR, if you leave any parameter blank, a soft error will occur and require your confirmation before submitting. To check for hard or soft errors in NetDMR you can click save and continue at the top or bottom of the DMR form and then reference the edit and check errors section at the bottom of the DMR form.

Hard Errors

- NetDMR has built-in functionality to assist permittees with proper DMR submission, generating soft errors (as described above) and hard errors to help avoid submitting erroneous DMRs. Hard errors in NetDMR are caused by mistakes such as using improper special characters, character lengths that are too long, conflicting selections such as inputting a NODI code and a sample value for the same parameter, and using invalid NODI codes. Hard errors must be corrected before the DMR can be validated. The DMR must be validated before the permittee can sign and submit it. If you are unable to troubleshoot a hard error and therefore cannot submit your DMR, contact the NetDMR Helpdesk.

Invalid NODI codes

- Make sure you use the appropriate NODI code. When in doubt, check with your permitting authority to determine which NODI code is correct. In NetDMR, NODI codes "E - Analysis not conducted/no sample" and "P - Laboratory Error or Invalid Test" will yield a reporting violation.
- When there are no values because a discharge has not occurred within the monitoring period, "C - No Discharge" is the proper NODI code. Do not use NODI code "C" for reporting Below Detection Level/No Detection. When there is evidence of a discharge, but sampling has not been conducted, use NODI code "E."
- NODI codes that yield violations require acknowledgement in NetDMR prior to signing and submitting the DMR.

Ensuring your DMRs are timely, accurate, and complete and your compliance status is accurate is critical to protecting the nation's surface waters. It is also important for avoiding reporting violations and potential enforcement action for otherwise compliant discharges. This is a reminder that you should regularly check your permit's compliance status to ensure your facility remains in compliance and ensure the permitting agency has the correct data. Whenever you are in doubt, your permitting authority is here to help.

Additional Compliance Resources

In addition to the resources listed above, the following resources may be helpful with complying with discharge monitoring report requirements.

- Reducing Significant Noncompliance with NPDES Permits – Resources for NPDES Permittees and Other Organizations (https://www.epa.gov/enforcement/national-compliance-initiative-reducing-significant-non-compliance-snc-npdes-permits).
  NetDMR Support Portal (https://usepa.servicenowservices.com/oeca_icis?id=netdmr_homepage).